

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE
Plaintiff,
v.

TRANS UNION LLC
CITY OF PHILADELPHIA
Defendant.

C.A. NO: 02-CV-4440

**TRANS UNION LLC'S MOTION FOR RECONSIDERATION
OF DECEMBER 11, 2003 ORDER ON SUMMARY JUDGMENT**

Defendant, Trans Union LLC ("Trans Union"), by and through its undersigned attorneys, moves this Court for an Order reconsidering its denial of Trans Union's motion for summary judgment with respect to plaintiff's claim of willful violation of the FCRA and qualified immunity for Plaintiff's state common law claims, upon the grounds set forth in the annexed memorandum of law.

Respectfully Submitted,

SATZBERG, TRICHON,
KOGAN & WERTHEIMER, P.C.

MARK E. KOGAN (10186)
BRUCE S. LUCKMAN (38636)
TIMOTHY P. CREECH (81728)

1818 Market St., 30th Floor
Philadelphia, PA 19103
(215) 575-7600; Fax: (215) 575-7688

*Counsel for Defendant,
Trans Union LLC*

DATED: December 18, 2003